

**SUPPORTING STATEMENT
FLIGHT PLANS
(Domestic - FAA Form 7233-1, and International - FAA Form 7233-4)
OMB #2120-0026**

A. Justification

1. Explain the circumstances that make the collection of information necessary.

The Federal Aviation Administration (FAA) is authorized and directed by Title 49, United States Code, paragraph 40103.(b), to prescribe air traffic rules and regulations governing the flight of aircraft for the protection and identification of aircraft and property and persons on the ground. Title 14, CFR, Part 91, Subchapter F, prescribes flight rules governing the operation of aircraft within the United States. These rules govern the operation of aircraft (other than moored balloons, kites, unmanned rockets and unmanned free balloons) within the United States and for flights across international borders. Paragraphs 91.153 and 91.169 address flight plan information requirements. Paragraph 91.173 states requirements for when an instrument flight rules (IFR) flight plan must be filed. International Standards Rules of the Air, Annex 2 to the Convention on International Civil Aviation paragraph 3.3 states requirements for filing international flight plans. Also, a security Notice to Airmen (NOTAM) has been issued requiring pilots using three (3) general aviation airports in the vicinity of Washington, DC (Potomac, Hyde, and College Park) to file a flight plan regardless of whether they are flying under visual flight rules (VFR) or IFR. This collection of information supports the Department of Transportation strategic goal on safety.

2. Indicate how, by whom, and for what purpose the information is to be used.

FAA Form 7233-1: Domestic flight plan information is used to govern the flight of aircraft for the protection and identification of aircraft and property and persons on the ground. The information is used by air traffic controllers, search and rescue (SAR) personnel, flight standards inspectors, accident investigators, military, and law enforcement.

FAA Form 7233-4: International flight plan information is used for the same purposes as domestic flight plans in addition to use by Customs and international controllers.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

Respondents may submit flight plan information 100% electronically. The FAA has been in compliance with the requirements of the Government Paperwork Reduction Act for many years for flight plan purposes. The overwhelming majority of flight plans are filed by electronic means, however, as a courtesy to our customers, we will accept a flight plan submitted on the paper form. Flight plans may be filed in the following ways:

- Air carrier or air taxi operations offices may transmit flight plans to Air Route Traffic Control Center (ARTCC) computers through the National Airspace Data Interchange Network (NADIN). The majority of air carrier/air taxi flights are processed in this manner.
- Air carrier and air taxi operators may submit flight plan information on scheduled flights to ARTCC's to be entered by the ARTCC's prestored flight plan program at the applicable times. For example, a flight that flew every Monday, Wednesday, and Friday, with the same equipment and routing, would be eligible for the prestored program.
- Pilots may call 1-800-WX-BRIEF and file their flight plans with a flight service specialist who enters the information directly into a computer system that automatically transmits the information to the appropriate air traffic facility. Pilots also have the option of using the Fast File voice recorder to store the information that will later be transcribed by a specialist.
- Using dial-up or Internet access, pilots may file flight plans electronically through a Direct User Access Terminal System (DUATS) vendor at no cost to the user. DUATS permits users to store static data (aircraft number, type, equipment, pilot's name, etc.) so that only dynamic data is required when filing a new flight plan.
- Private and corporate pilots who fly the same aircraft and routes at regular times may prestore those flight plans with an Automated Flight Service Station (AFSS). The flight plans will then be entered automatically into the air traffic system at the appropriate time.
- Multiple corporations have been granted the authority to electronically file flight plans directly with the FAA. Those corporations include air carriers, air taxis, and corporations who provide flight-planning services to pilots.
- Pilots who visit a Flight Service Station (FSS) or an AFSS in person may file flight plans by filling out paper forms and giving them to a specialist, or by filing orally with the specialist who will be entering the data into a computer and transmitting the flight plan electronically.

4. Describe efforts to identify duplication.

Due to the dynamic nature of flight plan data, there is negligible duplication of information. Air traffic computers identify duplicate flight plans. As stated in item 3, scheduled air carriers and air taxis as well as private or corporate pilots who fly the same aircraft and routes at regular times have options to prestore these flight plans. In addition, DUATS and private service corporations retain static data on pilots and aircraft so that only dynamic data is required for subsequent flight plans.

5. If the collection of information impacts small businesses.

The information required for flight plans is the minimum necessary to provide the services requested and does not represent a burden for small businesses. The multiple options for filing flight plans stated above provide convenient methods of filing flight plans for any system user.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The accuracy of flight plan information is essential to the safe and efficient use of the Air Traffic Control (ATC) system. Aircraft cannot operate in an IFR environment or fly transborder without a flight plan.

Without VFR flight plans, SAR efforts would be severely hampered in the event of an accident.

The user is the determining factor of the frequency of collection of information.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with 5 CFR 1320.5(d)(2)(i)-(viii).

This collection is consistent with 5 CFR 1320.5(d)(2)(i)-(viii).

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

A 60-Day notice for public comments was published in the Federal Register on March 15, 2006, vol. 71, no. 50, pages 13446-13447. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift is made to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

It is FAA policy to make factual information available to persons properly and directly concerned except information held confidential for good cause, i.e., a pilot's address and telephone number.

This data is used by FAA for SAR or accident-related functional responsibilities. All flight plan data is routinely destroyed after 15 days except for data retained due to an accident/incident investigation.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

No questions of a sensitive nature are asked.

12. Provide estimates of the hour burden of the collection of information.

Statistics are not kept on the total number of flight plans filed into the National Airspace System (NAS). Statistics are only kept on the number of flight plans filed through a FSS or AFSS. Statistics are not maintained separately for domestic and international flight plan forms nor is there a distinction made among methods of filing flight plans.

Although there is no tally on the number of flight plans filed through venues other than a FSS or AFSS, tallies are kept of the number of instrument departures. Since there must be a flight plan filed for any instrument flight, this number most nearly reflects the total number of instrument flight plans filed. (IFR flight plans are sometimes filed but not activated, in which case they would not be counted using IFR departures.)

In order to provide a more accurate accounting of the number of flight plans filed within the system, the number of VFR flight plans filed and tallied by a FSS or AFSS is added to the number of IFR departures.

FY05 Flight Plans

Total IFR Departures	16,223,810
Total VFR Flight Plans	<u>1,023,016</u>
Total Flight Plans Filed	17,246,826

In FY05, there were 609,325 certificated pilots. The number of Respondents were 300,000.

For this revision, an additional 482,726 flight plans filed at an estimated 1 minute per filing for a total of 8,045 hours is included in the total. At \$24 per hour, this results in an additional \$193,080.

There is a wide range of time required to file a flight plan. Flight plans that are prestored, for instance, require only the initial recording of information and are then put in the system multiple times from the initial information. Flight plans filed by an individual through a FSS or AFSS have been determined to take 2.5 minutes. Averaging repetitive electronic filing with person-to-person filing gives a 1 minute rough order of magnitude estimate of the length of time that it takes to file a flight plan. The reporting burden on the public, based on an average of 1 minute per flight plan times 17,246,826 flight plans, equals 287,447 hours public reporting hours.

Just as there is a wide range of time required to file flight plans, there is a wide range in cost. Cost per flight plan is lower for those using prestored flight plans than for those filed by an individual pilot. However, for the purpose of this justification, we are using the estimate of \$24 per hour for each respondent. Based on that estimate, the cost to respondents is figured as follows.

Summary:
287,447 hours
\$24 x 287,447 public reporting hours = \$6,898,728

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no additional costs not already included in question 12.

14. Provide estimates of annualized cost to the Federal government.

Prior to 1999, supporting statements on flight plans for the Paperwork Reduction Act Submission used the statistics that are kept on flight plans filed through flight service stations. Since the majority of flight plans are filed by commercial entities through electronic means, using only the figures on flight plans filed through a FSS or AFSS does not give an accurate accounting.

Aircraft may not operate in IFR conditions without an IFR flight plan. SAR services are difficult to provide to VFR aircraft without a flight plan. There currently is no accurate method for determining an annualized cost to the Federal Government for collecting flight plan information. Flight plan information is an integral part of providing Air Traffic Services and cannot be effectively extracted as a separate cost.

For the purposes of this report, the cost of initial flight plan processing will be estimated. Once received, flight plan information is updated as required and relayed throughout the air traffic system as necessary for the safe and efficient flow of air traffic. The cost of information updated as it is being used for ATC purposes is not included in this estimate.

Flight plans from the various sources initially enter the NAS through NADIN and are disseminated to the appropriate facility. The platform for NADIN is used to communicate information not only on flight plans, but also NOTAMS, SAR messages, Customs advisories, and internal information, etc. To estimate the annualized cost to the Federal Government of receiving flight plan information, a percentage of the NADIN operating cost will be used plus a percentage of personnel salary.

The total cost of NADIN operations for FY05 was \$22,407,794. This cost includes equipment, labor to maintain the equipment, and overhead. Approximately 50% of NADIN processing time is devoted to flight plans, or \$11,203,897.

To estimate the personnel cost of filing flight plans, we have used a percentage of the total salaries (pay and benefits) paid to the personnel in the ARTCC, Air Traffic Control Tower (ATCT), and FSS/AFSS. While controllers in a FSS/AFSS spend a greater percentage of their time filing flight plans than do controllers in a ARTCC/ATCT, their income is less and their numbers are fewer. Controllers in a ARTCC/ATCT receive most flight plans electronically from other sources and are only occasionally involved in the initial filing of a flight plan.

ARTCC/ATCT controllers:

FY05 salaries (pay and benefits)	\$3,161,197,247
----------------------------------	-----------------

FSS/AFSS controllers:

FY05 salaries (pay and benefits)	\$310,973,879
----------------------------------	---------------

Estimated percentage of time spent on filing flight plans:

ARTCC/ATCT controllers: 0.1%

FSS/AFSS controllers: 25.0%

Cost:

ARTCC/ATCT controllers: 0.1% x \$3,161,197,247 = \$ 3,161,197

FSS/AFSS controllers: 25.0% x \$ 310,973,879 = \$77,743,470

Total personnel cost: \$80,904,667

Equipment costs: \$11,203,897

Total cost – personnel and equipment: \$92,108,564

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.

The increase of 8,045 hours is due to a normal increase in aviation activity over the past 3 years and due to continuing security restrictions that have required or encouraged pilots to file flight plans for activity that previously may have been completed without a flight plan.

16. For collections of information whose results will be published, outline plans for tabulation, and publication.

The collection of this data is solely to provide a service to the users of the NAS and is not used for statistical, analytical, or publication purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The FAA is not requesting this exception.

18. Explain each exception to the certification statement identified in item 19, “Certification for Paperwork Reduction Act Submission,” of OMB Form 83-1.

There are no exceptions.

Attachments:

1. Supporting statement
2. 60 Day Notice
3. 30 Day Notice
4. FAA Form 7233-1
5. FAA Form 7233-4
6. 49 USC 40103
7. 14 CFR Part 91